

**REMARKS**

Applicant wishes to thank the Examiner for the detailed remarks and analysis. Accordingly, claims 1-20 are pending.

Claims 1-20 were rejected under 35 U.S.C. §112. Applicant respectfully traverses these rejections. The words within the claims, by their ordinary meaning provide a definite recitation of the claimed structure. While aspects of the claim may be broad, that is not the same as being indefinite. In particular, the Examiner questions what is meant by "A first graphical shape representative of known obstructions normally within a defined field." Of course, this language must be read in the context of the specification and drawings. In the context of this application, the claim is definite. The "known obstructions" would be those things which would normally be within the field, such as the window, frame, etc. The Examiner also questions what would be meant by the "controller operable to construct a second graphical shape in response to an unknown object entering said defined field." Again, taken in context with the specification and drawings, it is clear that an unknown object would be something such as an obstruction which enters into the field. The "map signature" language is known within the art of mapping, and a worker in this art would recognize quite well what is being disclosed and claimed in this application. Thus, it is submitted that the claims are improperly rejected under 35 U.S.C. §112. Reconsideration is requested.

Claims 1, 2 and 4-20 were rejected under 35 U.S.C. §102(e) as being anticipated by *Zhang* (5,955,854). Applicant respectfully traverses these rejections. The claims recite a first graphical shape representative of known obstructions normally within said defined field, said first graphical shape representative of said defined field when said defined field is clear of unknown objects. In other words, there will be known obstructions within the defined field. Known obstructions include objects which will always properly be within the field of view (e.g, window, window frame, door lock, etc...) that will not interfere with proper closure. Should an unknown

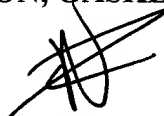
object, however, come within the defined field, the graphical shape will change and the object will be thereby detected.

*Zhang* does not disclose constructing a map signature having a graphical shape from the received signal. *Zhang* only detects an increase in a reflected signal. See Col. 10, lines 31-34. Detection of an increase in the reflected signal is relatively easy to confuse. This is the reason for *Zhang's* overriding concern for reflection from clouds, the sun and other sources which would provide a false increase in the reflected signal. [See *Zhang Figs. 34, 36, 48, 58, 59, and 61.*] Mapping according to the present invention is unaffected by such false reflections.

Applicant respectfully requests reconsideration and submits that this case is in condition for allowance. If the Examiner believes that a teleconference will facilitate moving this case forward to being issued, Applicant's representative can be contacted at the number indicated below.

Respectfully submitted,

**CARLSON, GASKEY & OLDS, P.C.**

  
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**CERTIFICATE OF MAILING**

I hereby certify that this Response is being deposited with the United States Postal Service as first-class mail, postage prepaid, in an envelope addressed to Box AF, Assistant Commissioner of Patents, Washington, D.C. on August 20, 2001.

  
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Raimi Blackerby